

RRTF Meeting 9-13-01

Update on the status of current projects:

The RED established the stakeholder process to develop mitigation measures in order to protect children from accidental rodenticide exposures. In order to close out the RSW process, the Agency has drafted an FRN rescinding the dye and bittering agent requirements as established in the Rodenticide Cluster RED. This FRN is expected to publish sometime in October.

Master labels and consumer labels- RD has drafted a strategy for master labeling (near completion). RD also expects to have draft guidance for consumer labels in October and to bring forth by way of a PR notice for 2002.

Other amendments to correct errors or omissions will be enacted when the RED is amended for eco. issues or via FRN. The Agency is looking at all comments sent in during the comment period and are taking those into consideration as well.

Eco. assessment- we expect to receive this from EFED @ 9/21 and plan to amend the RED in about 12 months. The FRN would start the 8-month timetable for data submission as required per the PDCI, which was temporarily put on hold, due to the RSW process. Other time frames were set for the GDCI as stated in the RED.

EPA's process for the ecological assessment and RED amendment is analogous to the Pilot Public Participation Process:

- Phase I - error only (share assessment with registrants and other agencies); 30 days
- III- public comment on risk assessment (post on internet); 60 days
- V - public comment on risk reduction options or proposal; 60 days
- VI- EPA develops risk management; no time frame

The RRTF presented a slide presentation expressing the following overall concern:

The RRTF believes that no ecological risk assessment should be issued in any form until a critical and in-depth analysis of the underlying data has been made.